



*Consulting Engineers  
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May 5, 2005  
(PBW Project No. 1278)

VIA E-MAIL

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: Interim Removal Action Scope of Work, Gulfco Marine Maintenance Site, Freeport,  
Texas

Dear Mr. Miller:

Thank you for your comments on the Draft Interim Removal Action (IRA) Scope of Work (SOW) for the Gulfco Marine Maintenance Superfund Site (the Site) in Freeport, Texas. The Draft IRA SOW was prepared by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy America Corporation (Chromalloy) and The Dow Chemical Company (Dow), and was provided to EPA on April 18, 2005. Your comments on this SOW were discussed in our telephone conversation on April 19, 2005. The attached Revised IRA SOW has considered your comments. A summary of the comments and our responses are provided below. The revised IRA SOW is being provided to you with the Draft Site Investigation and Removal Action (SI/RA) SOW, which is also attached to this letter.

*EPA Comment No. 1: An additional task should be added to include reporting activities associated with the IRA. These activities include: (1) submittal of weekly status updates to EPA via e-mail while the work is being performed; (2) submittal of a final documentation report after the work is completed; and (3) submittal of final laboratory reports, via e-mail, to EPA at the time they are received from the laboratory.*

Response: An additional task detailing the final documentation report to be submitted upon completion of the IRA has been added to the SOW (Task 8). This report will be submitted to the Texas Commission on Environmental Quality (TCEQ) with a copy to EPA. With the addition of this task, the schedule section (Section III.) of the SOW has been clarified to indicate that IRA field activities shall be completed within 120 days from the effective date of the AOC.

The additional reporting activities requested by EPA are inconsistent with the decisions and directions during our meeting of April 1, 2005. We were assured that there would not be duplication of oversight on this project and that the State of Texas TCEQ would be the lead agency for oversight, as it administered the Voluntary Cleanup Program. EPA is to review and

approve the Scope of Work for the Site at the outset, and TCEQ is to oversee the investigation and cleanup of the Site. A final report will be submitted to the TCEQ and EPA upon the completion of remediation of the Site. In addition to submitting a final report to EPA following the completion of remediation at the Site, LDL, Chromalloy and Dow agree to provide copies of other reports submitted to the TCEQ (as reflected in the schedule of deliverables, Appendix A, SI/RA SOW) to EPA for informational purposes. The final report is to be reviewed by EPA to ensure that the agreed upon Scope of Work was followed for the Site. This report will be the basis for delisting the Site.

*EPA Comment No. 2: Posting of appropriate signs should be included as part of the fence construction activities proposed in Task 6.*

Response: The requested activity has been added to Task 6.

*EPA Comment No. 3: Confirmation samples should be collected from the former AST tank farm containment area floor and berms following completion of pressure washing activities described in Task 3.*

Response: The requested activity has been added to Task 3.

*EPA Comment No. 4: A draft of the Fact Sheet proposed under Task 7 should be submitted to EPA for review and approval, prior to distribution to key stakeholders.*

Response: The requested activity has been added to Task 7. It is essential that we receive EPA's comments within 15 days of submittal of this draft to enable timely printing and mailing of the Fact Sheet. We propose to schedule a conference call at the end of the 15-day review period to review EPA's comments and agree on any changes.

*EPA Comment No. 5: EPA will view the proposed IRA as a time-critical removal action. As such, compliance with the substantive requirements of any applicable permits for Site activities will be required, but actually obtaining the permits may not be needed.*

Response: Comment noted.

*EPA Comment No. 6: An updated records search and field survey for water wells within 1/2-mile of the Site should be added to the proposed SOW.*

Response: The requested activity is included as Task 4 in the SI/RA SOW.

*EPA Comment No. 7: An IRA Work Plan should be submitted to EPA prior to the initiation of field activities.*

Response: Task 1 has been expanded to include submittal of a Work Plan prepared by the removal action contractor. Based on our discussions of April 1, we regard this as an information transmittal with no formal approval needed by EPA. There is no allowance in our schedule for EPA review and approval of a Work Plan.

Mr. Gary Miller  
May 5, 2005  
Page 3 of 3

Should you have any questions, do not hesitate to call me. As soon as we receive your concurrence on the attached IRA SOW, we will begin our contractor selection process. We also look forward to completing the SI/RA SOW so that this project can get underway.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a long horizontal flourish extending to the right.

Eric F. Pastor, P.E.  
Principal Engineer

Attachments

cc: Mr. Brent Murray - Sequa Corporation  
Mr. Scott Magelssen - The Dow Chemical Company  
Ms. Sandi VanWormer - The Dow Chemical Company  
Ms. Jeannine Sohayda - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morris III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP